REMARKS / DISCUSSION OF ISSUES

In the present response, claim 14 is cancelled without prejudice, and claims 1 and 3 – 11 are amended. No new matter is added.

Claims 1, 3 – 11 and 15 are now pending in the application. Claims 1, 11 and 15 are independent.

Claim Objections

Claim 11 is objected to under 37 CFR 1.75(c), as being of improper dependent form. In the present amendment, claim 11 is rewritten in independent form. Withdrawal of the objection to claim 11 is respectfully requested.

The Office Action also objects to claims 3 – 10. In the present response, claims 3 – 10 are amended to obviate this objection. Withdrawal of the objection to claims 3 – 10 is respectfully requested.

35 U.S.C. 101

Under 35 U.S.C. 101 the Office Action rejects claim 14, alleging that the claimed invention is directed to non-statutory subject matter.

In the present amendment, claim 14 is cancelled to obviate this rejection. Withdrawal of the rejection of claim 14 under 35 U.S.C. 101 is respectfully requested.

35 U.S.C. 103

The Office Action rejects claims 1, 3 – 6, 8, 11, 14 and 15 under 35 U.S.C. 103(a) over Iverson et al. (US Patent 5,852,664, hereinafter Iverson), in view of Hampapur et al. (US 2001/0003468 A1, hereinafter Hampapur).

Applicants submit that for at least the following reasons, claims 1, 3 – 6, 8, 11 and 15 are patentable over Iverson and Hampapur, either singly or in combination.

For example, claim 1, in part, requires:

"selectively reading from the bit-stream predetermined parameters,

wherein said predetermined parameters relate to perceptual information of the

multimedia signal; and

deriving a hash function from said parameters."

In the Office Action, page 4, the Office conceded that Iverson does not disclose:
"selectively reading from the bit-stream predetermined parameters, wherein said
predetermined parameters relate to perceptual information of the multimedia signal,"
as claimed. However, the Office Action alleged that Iverson, column 6, lines 56 – 64,
discloses the claimed feature: *"deriving a hash function from said parameters."*
Applicants respectfully traverse such allegation.

Applicants submit that since Iverson does not disclose selectively reading the
predetermined parameters from the bit-stream, then the parameters used by Iverson
to derive a hash function cannot be the predetermined parameters that relate to
perceptual information of the multimedia signal, as claimed. This is because there are
no such predetermined parameters available in Iverson from which a hash function
can be derived. Furthermore, Iverson, column 6, lines 56 – 64, discloses the
calculation of a lock word from the checksum and access word. However, Iverson,
column 3, lines 31 – 37, clearly discloses using the checksum and access word to
create a lock word restricting user access without regard to perceptual and non-
perceptual information. In other words, Iverson makes no distinction between
perceptual and non-perceptual information in generating the checksum. Therefore,
Iverson also fails to disclose the claimed feature: *"deriving a hash function from said*
parameters."

The Office Action cited Hampapur and alleged that Hampapur discloses the
selectively reading from the bit-stream predetermined parameters, wherein said
predetermined parameters relate to perceptual information of the multimedia signal.
Applicants submit that although Hampapur, paragraph [0006], discloses the extraction
of metadata from the actual video data, Hampapur does not teach or suggest any
derivation of hash function from the metadata. Hampapur only discloses that the
metadata is stored in a database system (paragraph [0005]), but does not disclose any

hash functions. Furthermore, as discussed above, in generating the lock word the checksum and access word, Iverson makes no distinction between perceptual and non-perceptual information; whereas, in Hampapur, the metadata is a representation of the actual visual data. Applicants submit that the lock word in Iverson is very different from the metadata in Hampapur, and that there is no reason and to replace one from another. A person ordinarily skilled in the art would not find it obvious to substitute the checksum and access word, which is independent of the perceptual information, by the metadata, which is a visual representation of the actual video data. Therefore, the combined teachings of Iverson and Hampapur still fail to disclose the deriving of a hash function from predetermined parameters relate to perceptual information of the multimedia signal, as claimed.

In view of at least the foregoing, Applicants submit that claim 1 is patentable over Iverson and Hampapur, either singly or in combination.

Independent claim 11, in part, also requires:

"*selectively reading from the bit-stream predetermined parameters, wherein said predetermined parameters relate to perceptual information of the multimedia signal; and*

deriving a hash function from said parameters."

Furthermore, independent claim 15, in part, requires:

"*a decoder arranged to selectively read from the bit-stream predetermined parameters, wherein said predetermined parameters relate to perceptual information of the multimedia signal;*

a processing unit arranged to derive a hash function from said parameters."

Applicants essentially repeat the above arguments for claim 1, and apply them to claims 11 and 15, pointing out why the combined teachings of Iverson and Hampapur fail to teach the above claimed features. Therefore, for at least the above reasons, claims 11 and 15 are patentable over Iverson and Hampapur, either singly or in combination. Claims 3 – 6 and 8 depend from claim 1 and inherit all the features of

claim 1. Therefore, claims 3 – 6 and 8 are patentable for at least the reasons discussed above with respect to claim 1, with each claim containing further distinguishing features.

Under 35 U.S.C. 103(a), the Office Action rejects claim 7 over Iverson, in view of Hampapur, and further in view of Makiyama et al. (US Patent 6,687,409 B1); claim 9 over Iverson, in view of Hampapur, and further in view of Krapp et al. (US 2002/0169934 A1); and claim 10 over Iverson, in view of Hampapur, and further in view of Levine (US Patent 6,266,644 B1).

Claims 7, 9 and 10 depend from claim 1 and inherit all the features of claim 1. Applicants submit that none of the cited secondary references can in any way cure the defects pointed out above in Iverson and Hampapur with respect to claim 1. Thus, claims 7, 9 and 10 are patentable for at least the reason that they depend from claim 1, with each claim containing further distinguishing features. Claim 14 is cancelled.

Withdrawal of the rejection of claims 1, 3 – 11, 14 and 15 under 35 U.S.C. §103(a) is respectfully requested.

Conclusion

      In view of the foregoing, Applicants respectfully request that the Examiner withdraw the objection(s) and/or rejection(s) of record, allow all the pending claims, and find the application in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

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Respectfully submitted,

/Hay Yeung Cheung/
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